

LAW OFFICES  
**GEDNEY M. HOWE, III, P.A.**  
8 CHALMERS STREET  
POST OFFICE BOX 1034  
CHARLESTON, S.C. 29402  
[www.gedneyhowe.com](http://www.gedneyhowe.com)

GEDNEY M. HOWE, III  
ALVIN J. HAMMER  
ROBERT J. WYNDHAM

TEL. (843) 722-8048  
FAX (843) 722-2140  
[ghowe@gedneyhowe.com](mailto:ghowe@gedneyhowe.com)  
[rwyndham@gedneyhowe.com](mailto:rwyndham@gedneyhowe.com)

August 14, 2020

**VIA ECF**

Clerk of Court  
USDC District of South Carolina  
Charleston Division

Re: Brian Hughs v. Royal Energy Resources, Inc., et al.  
Case No.: 2:20-cv-01566-DCN

Dear Sir/Madam:

This letter is to confirm that pursuant to Local Rule 12.01 (D.S.C.), Plaintiff has agreed to an extension of time until August 14, 2020 for Defendants Royal Energy Resources, Inc. and William Tuorto to respond to Plaintiff's Complaint filed in the above-referenced matter. Attached is email to Bob Mottern granting extension of time.

With kind regards, I am

Sincerely,

GEDNEY M. HOWE, III, PA

s/Robert J. Wyndham

Robert J. Wyndham (Federal Bar #5275)  
[rwyndham@gedneyhowe.com](mailto:rwyndham@gedneyhowe.com)

Enclosure: as stated

## Karen Sudlow

---

**From:** Rishi Bhandari <rb@mandelbhandari.com>  
**Sent:** Friday, July 24, 2020 5:21 PM  
**To:** Bob Mottern  
**Cc:** Charline Le Barrasso; Christy F. Allen; Leah Vickers  
**Subject:** Re: Hughs v. Royal

Bob,

We agree to extend the time for Defendants to answer until August 14. However, absent extenuating circumstances, we will not be able to provide another extension of the Defendants' time to answer.

Best regards,  
Rishi

On Thu, Jul 23, 2020, 5:35 PM Bob Mottern <[bmottern@investmentlawgroup.com](mailto:bmottern@investmentlawgroup.com)> wrote:  
Rishi,

I am writing again to see if you would have a problem extending the answer date again. Rhino filed for chapter 11 this afternoon. Since we last spoke, we have provided a lot of information to the insurance company, but have been unable to get either an acknowledgment of coverage or an indication of when it will make a decision.

Obviously royal is a candidate for bankruptcy as well, and that certainly would dispose of the solvency issue under the policy, but that is a step the client would rather not take. The insurer raised other issues besides solvency, fwiw, but we think we addressed them all adequately.

While I will be assisting local counsel in the matter, I am a little disabled at the moment, having been in the hospital until yesterday with a severe infection from a fishing accident.

I would like to extend the answer date until one week after I get back from vacation, which would be until 8/14.

Please let me know and I'm available on my cell 770-596-9453, to answer any questions you might have.

Bob Mottern

Get [Outlook for iOS](#)